

IN THE MATTER OF:
DORIS RODRIGUEZ-MARTIN
Debtor(s)

CASE NO: 19-06282 EAG
CHAPTER 13

OBJECTION TO CLAIM NUMBER TWO (2)

TO THE HONORABLE COURT:

COMES NOW, the above mentioned debtors represented by the undersigned attorney and most respectfully alleges and prays:

1. On December 2, 2019, PREFERRED CREDIT, INC., filed proof of claim #2-1, in the amount of \$2,253.92, as a secured claim.
2. Debtor objects proof of claim #2-1 pursuant to Fed. R. Bankr. P. 3001 (e); since it lacks of evidence of perfection of lien to demonstrate that Preferred Credit, Inc. has the right to receive payments under the plan.

WHEREFORE, debtor requests very respectfully of this Honorable Court to disallow the aforementioned claim two (2-1).

NOTICE

Within thirty (30) days after service as evidence by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 2006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may schedule a hearing.

CERTIFICATE OF SERVICE

WE CERTIFY: That on this same date and by regular U.S. mail a copy of this motion has been sent to Jose R. Carrion-Morales, Esq. Rivera, Standing Chapter 13 Trustee, Old San Juan Station, P.O. Box 9023884, San Juan, PR, 00902-3884 and to Preferred Credit, Inc., 628 Roosevelt Road, Suite 100, Saint Cloud, MN 56301.

Respectfully submitted

In Mayaguez, Puerto Rico this December 10, 2019.

PUERTO RICO LEGAL ADVISORS, LLC
Attorney for Petitioner(s)
182 Sur Ramón Emeterio Betances
Mayagüez, PR 00680
Tel: (787)265-1111
Fax: (787)831-5291
mrplawoffices@gmail.com

ELECTRONICALLY FILED
/S/ Marggie Rodríguez-Pérez
USDC- PR 303608

MASTER ADDRESS LIST

DORIS RODRIGUEZ MARTIN
URB VALLE VERDE
CALLE 3 B 16
SAN GERMAN, PR 00683

MARGGIE RODRIGUEZ-PEREZ
PUERTO RICO LEGAL ADVISORS, LLC
182 SUR RAMON EMETERIO BETANCES
MAYAGUEZ, PR 00680

ISLAND FINANCE
BANKRUPTCY DEPT
PO BOX 195369
SAN JUAN, PR 00919-5369

ISLAND FINANCE PLUS
PO BOX 266
SAN GERMAN, PR 00683

PREFERRED CREDIT
PO BOX 70157
SAN JUAN, PR 00936-8157

PREFERRED CREDIT INC
PO BOX 1970
SAINT CLOUD, MN 56302-1970

SANTANDER FINANCIAL / ISLAND FINANCE DIV
PO BOX 195369
SAN JUAN, PR 00919-5369

SCOTIABANK DE PUERTO RICO
PO BOX 362394
SAN JUAN, PR 00936